

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

CODY C. EDRINGTON,

Plaintiff,

v.

RYDER GLOBAL SERVICES, LLC,  
a/k/a RYDER INTEGRATED  
LOGISTICS, INC.,

Defendant,

v.

QUENTIN D. CAMPBELL,

Defendant.

Case No. 7:21-cv-05000

**SUPPLEMENTAL FILING  
OF STATE COURT PLEADINGS**

TO: The Clerk of the United States District Court, District of Nebraska.

Please see the attached State Court Pleadings to supplement our Notice of Removal filed with this Court on February 4, 2021.

RESPECTFULLY SUBMITTED this 5th day of February, 2021.

BY: /s/ Terrance O. Waite  
Terrance O. Waite, #15497  
FOR: WAITE & McWHA  
116 N. Dewey – P.O. Box 38  
North Platte, NE 69103  
(308) 532-2202  
twaite@northplattelaw.com  
Attorney for the Defendant

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 5th day of February, 2021, a true and correct copy of the foregoing was served by email and regular US Mail, postage prepaid, upon the following:

Stephanie Flynn  
Stephanie Flynn Law Office, P.C., L.L.O.  
610 J Street, Suite 320  
Lincoln, NE 68508  
(402) 325-8469  
[sflynn@stephanieflynnlaw.com](mailto:sflynn@stephanieflynnlaw.com)  
Attorney for Plaintiff

Quentin D. Campbell  
270 Muhammad Ali Ave.  
Newark, NJ 07108  
Defendant

/s/ Terrance O. Waite  
Attorney for Defendant

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 4th day of February, 2021, a true and correct copy of the foregoing was served by email and regular US Mail, postage prepaid, upon the following:

Stephanie Flynn  
Stephanie Flynn Law Office, P.C., L.L.O.  
610 J Street, Suite 320  
Lincoln, NE 68508  
(402) 325-8469  
[sflynn@stephanieflynnlaw.com](mailto:sflynn@stephanieflynnlaw.com)  
Attorney for Plaintiff

Quentin D. Campbell  
270 Muhammad Ali Ave.  
Newark, NJ 07108  
Defendant

/s/ Terrance O. Waite  
Attorney for Defendant

Filed in Buffalo County Court

\*\*\* EFILED \*\*\*

Case Number: C09CI200002364

Transaction ID: 0012381396

Filing Date: 12/23/2020 06:11:21 PM CST

IN THE COUNTY COURT OF BUFFALO COUNTY, NEBRASKA

CODY C. EDRINGTON,

Plaintiff,

vs.

RYDER GLOBAL SERVICES, LLC, a/k/a  
RYDER INTEGRATED LOGISTICS, INC.,

Defendant,

vs.

QUENTIN D. CAMPBELL,

Defendant.

Case No. CI 20-\_\_\_\_\_

COMPLAINT FOR DAMAGES

COMES NOW the Plaintiff, Cody C. Edrington, and for his claim against Defendants, Ryder Global Services, LLC, a/k/a Ryder Integrated Logistics, Inc., and Quentin D. Campbell, alleges:

1. At all times relevant herein, Plaintiff was a resident of Iona, Idaho.
2. At all times relevant herein, Defendant, Ryder Global Services, LLC, a/k/a Ryder Integrated Logistics, Inc., was a Florida Limited Liability Company duly authorized to conduct business in the State of Nebraska and who was doing business in Buffalo County, Nebraska.
3. At all times relevant herein, Defendant, Quentin D. Campbell, was a resident of Newark, New Jersey.
4. This Court has personal jurisdiction over Defendant, Ryder Global Services, LLC, a/k/a Ryder Integrated Logistics, Inc., and Defendant, Quentin D. Campbell, pursuant to Neb. Rev. Stat. § 25-536(1)(c) because they have availed themselves into and have caused tortious injury in the State of Nebraska.
5. On or about Wednesday, December 28, 2016, Cody C. Edrington was operating an 18-wheeler truck when he was struck by another 18-wheeler truck, owned by Defendant, Ryder Global Services, LLC, a/k/a Ryder Integrated Logistics, Inc., and driven by Defendant, Quentin D. Campbell, on Interstate 80 near mile marker 286 in Buffalo County, Nebraska. ("Collision").

6. On the date and time of the Collision described in paragraph 5, Defendant, Quentin D. Campbell, was an agent acting within the course and scope of his employment and authority for Defendant, Ryder Global Services, LLC, a/k/a Ryder Integrated Logistics, Inc., for which Ryder Global Services, LLC, a/k/a Ryder Integrated Logistics, Inc., would be vicariously liable to Plaintiff.

7. Upon information and belief, immediately prior to the Collision, Defendant, Quentin D. Campbell, driving in the far-right lane of traffic on Interstate 80. Plaintiff, Cody C. Edrington, merged onto Interstate 80 with his flashers on and was gaining speed when Defendant, Quentin D. Campbell, rear-ended Plaintiff, Cody C. Edrington.

8. The sole and proximate cause of the Collision was the negligence of Defendant, Quentin D. Campbell.

9. Defendant was negligent in one or more of the following ways:

- a. Failing to keep a proper lookout;
- b. Failing to maintain proper control;
- c. Following too closely;
- d. Failing to take into consideration other factors that affect driving, to wit: driving while tired and/or falling asleep;
- e. Violating the Nebraska Rules of the Road; and
- f. Being otherwise negligent in a manner not presently known to Plaintiff, Cody C. Edrington.

10. As a direct and proximate cause of the Defendant's, Quentin D. Campbell's, negligence, as set forth above, Plaintiff, Cody C. Edrington, sustained the following injuries, including, but not limited to:

- a. Traumatic Brain Injury;
- b. Blunt force trauma injury to shoulders;
- c. Blunt force trauma injury to neck; and
- d. Other serious injuries not presently known.

11. As a direct and proximate cause of the of the Defendant's, Quentin D. Campbell's, negligence, as set forth above, Plaintiff, Cody C. Edrington, sustained and incurred the following damages:

- a. Permanent injury – NJI2d §4.01(1);

- b. Temporary and Permanent Disability in the past and future – NJI2d §4.01(1);
- c. Medical care and supplies reasonably needed and actually provided to Plaintiff in the past totaling \$9,895.55, plus a currently unknown amount to be determined, and a currently unknown amount in the future – NJI2d §4.01(2);
- d. Lost wages in the past and in the future – NJI2d §4.01(3);
- e. Loss of earning capacity – NJI2d §4.01(4); and
- f. Physical pain, mental suffering, emotional distress, and loss of enjoyment of life in the past, and it is reasonably certain that Plaintiff, Cody C. Edrington, will experience physical pain, mental suffering, emotional distress, and loss of enjoyment of life in the future – NJI2d §4.01(5).

12. At the time of her injury, Plaintiff, Cody C. Edrington, was 7 years old, being born in 1959.

WHEREFORE, Plaintiff prays for judgment on his claim against Defendants for medical care expenses in the past totaling \$9,895.55 plus a currently unknown amount to be determined; for medical care expenses in the future in an amount to be determined; for general damages; for prejudgment interest; for the costs of this action; and such other and further relief as the Court deems just and proper.

CODY C. EDRINGTON, Plaintiff

/s/ Stephanie Flynn  
Stephanie Flynn #24565  
Stephanie Flynn Law Office, P.C., L.L.O.  
610 J Street, Suite 320  
Lincoln, NE 68508  
(402) 325-8469  
(402) 464-0250 Fax  
sflynn@stephanieflynnlaw.com  
Attorney for Plaintiff

Filed in Buffalo County Court

\*\*\* EFILED \*\*\*

Case Number: C09CI200002364

Transaction ID: 0012381396

Filing Date: 12/23/2020 06:11:21 PM CST

IN THE COUNTY COURT OF BUFFALO COUNTY, NEBRASKA

CODY C. EDRINGTON,

Plaintiff,

vs.

RYDER GLOBAL SERVICES, LLC, a/k/a  
RYDER INTEGRATED LOGISTICS, INC.,

Defendant,

vs.

QUENTIN D. CAMPBELL,

Defendant.

Case No. CI 20-\_\_\_\_\_

PRAECIPE FOR SUMMONS

TO THE CLERK OF THE DISTRICT COURT

Please issue summons for service by certified mail upon the Defendants at:

Ryder Global Services, LLC, a/k/a  
Ryder Integrated Logistics, Inc.  
11690 NW 105<sup>th</sup> Street  
Miami, FL 33178-1103

and

Ryder Global Services, LLC, a/k/a  
Ryder Integrated Logistics, Inc.  
Fatovic, Robert D  
11690 NW 105<sup>th</sup> Street  
Miami, FL 33178-1103

and

Quentin D. Campbell  
270 Muhamma Ali ave  
Newark, NE 07108



CODY C. EDRINGTON, Plaintiff

/s/ Stephanie Flynn

Stephanie Flynn #24565  
Stephanie Flynn Law Office, P.C., L.L.O.  
610 J Street, Suite 320  
Lincoln, NE 68508  
(402) 325-8469  
(402) 464-0250 Fax  
sflynn@stephanieflynnlaw.com  
Attorney for Plaintiff

Image ID:  
D00607686C09

SUMMONS

Doc. No. 607686

IN THE COUNTY COURT OF BUFFALO COUNTY, NEBRASKA  
P.O. Box 520  
Kearney NE 68848 0520

Cody C Edrington Edri v. Ryder Global Services, LLC and Quentin D Campbell  
Case ID: CI 20 2364

TO: Ryder Global Services, LLC  
DBA: Ryder Integrated Logistics, Inc

**FILED BY**  
Clerk of the Buffalo County Court  
12/28/2020

You have been sued by the following plaintiff(s):

Cody C Edrington Edri

Plaintiff's Attorney: Stephanie N Flynn  
Address: 610 J Street, Suite 320  
Lincoln, NE 68508

Telephone: (402) 325-8469

A copy of the complaint/petition is attached. To defend this lawsuit, an appropriate response must be served on the parties and filed with the office of the clerk of the court within 30 days of service of the complaint/petition. If you fail to respond, the court may enter judgment for the relief demanded in the complaint/petition.

Date: DECEMBER 28, 2020

BY THE COURT:

*Sharmen Gonzales*  
Clerk



PLAINTIFF'S DIRECTIONS FOR SERVICE OF SUMMONS AND A COPY OF THE COMPLAINT/PETITION ON:

Ryder Global Services, LLC  
11690 NW 105th Street  
Miami, FL 33178

Method of service: Registered Mail

You are directed to make such service within twenty days after date of issue, and show proof of service as provided by law.

**SERVICE RETURN**

Doc. No. 607686

Buffalo County Court  
P.O. Box 520  
Kearney NE 68848 0520

To:

Case ID: CI 20 2364 Edrington v. Ryder Global Services, LLC

Received this Summons on \_\_\_\_\_, I hereby certify that on  
\_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_M. I served copies of the Summons  
upon the party:

by \_\_\_\_\_

as required by Nebraska state law.

Service and return \$ \_\_\_\_\_

Copy \_\_\_\_\_

Mileage \_\_\_\_\_ miles

TOTAL \$ \_\_\_\_\_

Date: \_\_\_\_\_ BY: \_\_\_\_\_  
(Sheriff or authorized person)

**CERTIFIED MAIL  
PROOF OF SERVICE**

Copies of the Summons were mailed by certified mail,  
TO THE PARTY: \_\_\_\_\_

At the following address: \_\_\_\_\_

on the \_\_\_\_\_ day of \_\_\_\_\_, as required by Nebraska state law.

Postage \$ \_\_\_\_\_ Attorney for: \_\_\_\_\_

The return receipt for mailing to the party was signed on \_\_\_\_\_.

To: Ryder Global Services, LLC  
11690 NW 105th Street  
Miami, FL 33178

From: Stephanie N Flynn  
610 J Street, Suite 320  
Lincoln, NE 68508

**ATTACH RETURN RECEIPT & RETURN TO COURT**

Image ID:  
D00607687C09

SUMMONS

Doc. No. 607687

IN THE COUNTY COURT OF BUFFALO COUNTY, NEBRASKA  
P.O. Box 520  
Kearney NE 68848 0520

Cody C Edrington Edri v. Ryder Global Services, LLC and Quentin D Campbell  
Case ID: CI 20 2364

TO: Quentin D Campbell

**FILED BY**  
Clerk of the Buffalo County Court  
12/28/2020

You have been sued by the following plaintiff(s):

Cody C Edrington Edri

Plaintiff's Attorney: Stephanie N Flynn  
Address: 610 J Street, Suite 320  
Lincoln, NE 68508

Telephone: (402) 325-8469

A copy of the complaint/petition is attached. To defend this lawsuit, an appropriate response must be served on the parties and filed with the office of the clerk of the court within 30 days of service of the complaint/petition. If you fail to respond, the court may enter judgment for the relief demanded in the complaint/petition.

Date: DECEMBER 28, 2020

BY THE COURT:

*Sharmen Gonzales*  
Clerk



PLAINTIFF'S DIRECTIONS FOR SERVICE OF SUMMONS AND A COPY OF THE COMPLAINT/PETITION ON:

Quentin D Campbell  
270 Muhamma Ali ave  
Newark, NJ 07108

Method of service: Registered Mail

You are directed to make such service within twenty days after date of issue, and show proof of service as provided by law.

**SERVICE RETURN**

Doc. No. 607687

Buffalo County Court  
P.O. Box 520  
Kearney NE 68848 0520

To:

Case ID: CI 20 2364 Edrington v. Ryder Global Services, LLC

Received this Summons on \_\_\_\_\_, I hereby certify that on  
\_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_M. I served copies of the Summons  
upon the party:

by \_\_\_\_\_

as required by Nebraska state law.

Service and return \$ \_\_\_\_\_

Copy \_\_\_\_\_

Mileage \_\_\_\_\_ miles

TOTAL \$ \_\_\_\_\_

Date: \_\_\_\_\_ BY: \_\_\_\_\_  
(Sheriff or authorized person)

**CERTIFIED MAIL  
PROOF OF SERVICE**

Copies of the Summons were mailed by certified mail,  
TO THE PARTY: \_\_\_\_\_

At the following address: \_\_\_\_\_

on the \_\_\_\_\_ day of \_\_\_\_\_, as required by Nebraska state law.

Postage \$ \_\_\_\_\_ Attorney for: \_\_\_\_\_

The return receipt for mailing to the party was signed on \_\_\_\_\_,

To: Quentin D Campbell  
270 Muhamma Ali ave  
Newark, NJ 07108

From: Stephanie N Flynn  
610 J Street, Suite 320  
Lincoln, NE 68508

**ATTACH RETURN RECEIPT & RETURN TO COURT**

Filed in Buffalo County Court

\*\*\* EFILED \*\*\*

Case Number: C09CI200002364

Transaction ID: 0012494888

Filing Date: 01/12/2021 11:59:01 AM CST

## SERVICE RETURN

Buffalo County Court

P.O. Box 520

Kearney

NE 68848 0520

To:

Case ID: CI 20 2364 Edrington v. Ryder Global Services, LLC

Received this Summons on \_\_\_\_\_, I hereby certify that on

\_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_M. I served copies of the Summons  
upon the party:

by \_\_\_\_\_

as required by Nebraska state law.

Service and return \$ \_\_\_\_\_

Copy \_\_\_\_\_

Mileage \_\_\_\_\_ miles \_\_\_\_\_

TOTAL \$ \_\_\_\_\_

Date: \_\_\_\_\_ BY: \_\_\_\_\_  
(Sheriff or authorized person)CERTIFIED MAIL  
PROOF OF SERVICE

Copies of the Summons were mailed by certified mail,

TO THE PARTY: Ryder Global Services, LLC a/k/aRyder Integrated Logistics, Inc.At the following address: 11690 NW 105th StreetMiami, FL 33178-1103on the 28th day of December 2020, as required by Nebraska state law.Postage \$ 6.90 Attorney for: Cody Edrington

The return receipt for mailing to the party was signed on \_\_\_\_\_.

To: Ryder Global Services, LLC  
11690 NW 105th Street

Miami, FL 33178

From: Stephanie N Flynn  
610 J Street, Suite 320  
Lincoln, NE 68508

ATTACH RETURN RECEIPT &amp; RETURN TO COURT

7017 0190 0000 8755 7405

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT Domestic Mail Only	
For delivery information, visit our website at <a href="http://www.usps.com">www.usps.com</a> ®	
OFFICIAL USE	
Certified Mail Fee \$ 3.55	Postmark Here
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy) \$ 2.85	
<input type="checkbox"/> Return Receipt (electronic) \$	
<input type="checkbox"/> Certified Mail Restricted Delivery \$	
<input type="checkbox"/> Adult Signature Required \$	
<input type="checkbox"/> Adult Signature Restricted Delivery \$	
Postage \$ .50	
Total Postage and Fees \$ 6.90	
Sent To <u>Ryder Global Services, LLC, d/b/a</u> <u>Ryder Integrated Logistics, Inc.</u>	
Street and Apt. No., or PO Box No. <u>11690 NW 105th Street</u>	
City, State, ZIP+4® <u>Miami, FL 33178-1103</u>	
PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions	

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<p>1. Complete items 1, 2, and 3.</p> <p>2. Print your name and address on the reverse so that we can return the card to you.</p> <p>3. Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to: <u>Ryder Global Services, LLC d/b/a</u> <u>Ryder Integrated Logistics, Inc.</u> <u>11690 NW 105th Street</u> <u>Miami, FL 33178-1103</u></p>	<p>A. Signature <u>X</u> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>2. Article Number (Transfer from service label) 7017 0190 0000 8755 7405</p>	<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™</p> <p><input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> Signature Confirmation Restricted Delivery (over \$500)</p>
PS Form 3811, July 2015 PSN 7530-02-000-9063	Domestic Return Receipt

1/12/2021

USPS.com® - USPS Tracking® Results

**ALERT: USPS IS EXPERIENCING UNPRECEDENTED VOLUME INCREASES AND LIMITED EMPL...****USPS Tracking®****FAQs >****Track Another Package +****Tracking Number: 70170190000087557405****Remove X**

Your item has been delivered to an agent for final delivery in MIAMI, FL 33178 on January 5, 2021 at 12:36 pm.

**✓ Delivered to Agent**

January 5, 2021 at 12:36 pm  
Delivered to Agent for Final Delivery  
MIAMI, FL 33178

**Get Updates ∨**

Feedback

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**Text & Email Updates**

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**Tracking History**

**January 5, 2021, 12:36 pm**  
Delivered to Agent for Final Delivery  
MIAMI, FL 33178

Your item has been delivered to an agent for final delivery in MIAMI, FL 33178 on January 5, 2021 at 12:36 pm.

**January 4, 2021, 10:03 pm**  
Departed USPS Regional Facility  
MIAMI FL DISTRIBUTION CENTER



1/12/2021

USPS.com® - USPS Tracking® Results

**January 4, 2021, 7:30 pm**  
Arrived at USPS Regional Facility  
MIAMI FL DISTRIBUTION CENTER

**January 2, 2021**  
In Transit to Next Facility

**December 29, 2020, 5:39 am**  
Departed USPS Regional Facility  
OMAHA NE DISTRIBUTION CENTER

**December 28, 2020, 11:15 pm**  
Arrived at USPS Regional Facility  
OMAHA NE DISTRIBUTION CENTER

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#### Product Information

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Feedback  
✓

See Less ^

## Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

**FAQs**

## Certificate of Service

I hereby certify that on Tuesday, January 12, 2021 I provided a true and correct copy of the Return-Summons to the following:

Campbell,Quentin,D service method: No Service

Ryder Global Services, LLC service method: No Service

Signature: /s/ Flynn, Stephanie Nicole (Bar Number: 24565)